

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	WC Docket No. 12-23
Advancing Broadband Availability Through)	
Digital Literacy Training)	
)	WC Docket No. 03-109
Lifeline and Link Up		

REPLY TO OPPOSITIONS

INTRODUCTION AND SUMMARY

Pursuant to § 1.429(g) of the Federal Communications Commission’s (“FCC”) rules, the Public Service Commission of the District of Columbia (“DC PSC”) respectfully submits this reply in response to Oppositions and Comments filed in response to the DC PSC’s Petition for Clarification¹ of the *Lifeline Modernization Order*.² Contrary to the Opposition filed by Verizon,³ it is appropriate for the FCC to examine the classification of Voice over Internet

¹ *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding, Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, Petition for Clarification of the Public Service Commission of the District of Columbia, filed April 2, 2012. Since no party commented on the DC PSC’s first request in its Petition, for the FCC to clarify state obligations when states have no jurisdiction over certain types of eligible telecommunications carriers (ETC), the DC PSC does not address it in this reply except to urge the FCC to provide clarification on the issue.

² *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding, Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, Order and Further Notice of Proposed Rulemaking (*Lifeline Modernization Order*), released February 6, 2012.

³ *Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding, Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, Opposition of Verizon, filed May 7, 2012.

Protocol (VoIP) services in this proceeding, as VoIP services will be covered by Lifeline funding. The DC PSC continues to support the classification of VoIP services as telecommunications services.

THE INCLUSION OF VOIP SERVICES AS SUPPORTED SERVICES FOR LIFELINE SUPPORT SHOULD LEAD TO THEIR CLASSIFICATION AS TELECOMMUNICATIONS SERVICES.

In the *Lifeline Modernization Order*, the FCC extended its new definition of “voice services” to cover the services supported by Lifeline funds. The new definition of “voice services” includes voice services provided over IP-enhanced networks.⁴ In its Petition, the DC PSC requested that since the new definition of “voice service” includes VoIP services, VoIP services should be classified as telecommunications services.⁵ Verizon DC objects to this request, arguing that it is beyond the scope of this proceeding. Verizon also argues that the definitional change merely allows existing ETCs to serve Lifeline customers with any technology that they choose.⁶ This argument does not address the fact that with the definition change, VoIP services, which are unregulated by state commissions, are now included as Lifeline services. Thus, state commissions will not be able to redress any complaints about VoIP Lifeline service. To prevent this result, the FCC should classify VoIP services as telecommunications services.⁷

⁴ *Lifeline Modernization Order* at ¶ 47.

⁵ DC PSC Petition at 3-4.

⁶ Verizon Opposition at 4-5.

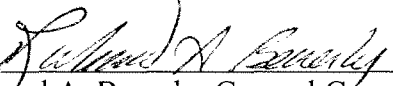
⁷ The DC PSC notes that the National Association of State Utility Consumer Advocates (NASUCA) supports the DC PSC’s position. *See, Further Inquiry into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding, Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, Comments of the National Association of State Utility Consumer Advocates on Petitions for Reconsideration, filed May 7, 2012.

CONCLUSION

The DC PSC appreciates the opportunity to submit this reply and argues the FCC to grant both requests in its Petition for Clarification.

Respectfully submitted,

**PUBLIC SERVICE COMMISSION
of the DISTRICT OF COLUMBIA**

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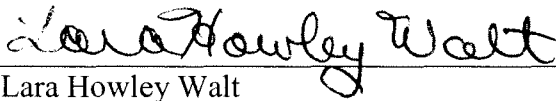
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May 15, 2012

CERTIFICATE OF SERVICE

I hereby certify that on May 15, 2012, a copy of the foregoing was sent via United States mail, postage prepaid, to the following:


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